

**DOCKETED**

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*Comment Received From: Linda Urata*  
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**Kern COG Comments on the 2019 CALeVIP Program 10 12 2018**

*Additional submitted attachment is included below.*



October 12, 2018

Brian Fauble  
California Energy Commission  
Docket Unit, MS-4  
RE: Docket No. 17-EVI-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

Filed electronically: <https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=17-EVI-01>

RE: Docket No. 17-EVI-01      2019 CALeVIP Project Roadmap, Central Valley Incentive Project

To whom it may concern:

Kern Council of Governments (Kern COG) appreciates the inclusion of Kern County in the Central Valley Region of the 2019 CALeVIP Program. This will be an exciting opportunity to implement the Kern EV Blueprint Plan which will be completed in June 2019 resulting in cleaner air and healthier communities throughout Kern County.

Kern COG welcomes the opportunity to comment on the proposed 2019 CALeVIP Project Roadmap, Central Valley Incentive Project. Our staff attended the workshop in Fresno on Wednesday, October 3, 2018. We appreciate the opportunities provided for dialog on this important resource to advance the deployment of electric vehicle charging stations.

To support Governor Brown's deployment goals for electric vehicles, Kern COG projects the need for Kern County to be 4,000 charging spaces, roughly 2,485 charging stations as a mix of L1, L2 and DC Fast Chargers. The California Energy Commission (CEC) projects on the low-end a need in Kern County for Kern County at 2,141 charging stations and at the high-end 2,871 charging stations and does not include L1 chargers in this projection.

Kern COG recently participated on a review committee, evaluating several proposals to install L2 charging at multi-unit dwellings in Kern and Tulare Counties. The lowest bid for 2 Dual Port L2 stations was \$18,700 at one site. The highest *reasonable* bid for 2 Dual Port L2 stations was \$40,052 at another site (one bid came in at more than \$105,000). As the CEC is aware, the cost per site ranges broadly. So to truly incentivize the installation of charging stations, the incentive amount must be attractive to overcome inertia.

- 1) **The L2 incentive amount is too low to be considered a motivating incentive.** The 2019 CALeVIP Project Roadmap proposes that in the Central Valley counties of Kern, Fresno, and San Joaquin the incentive for a dual-port Level 2 charger would be set at \$3,500 in light of the San Joaquin Valley Air Pollution Control District (VAD) ChargeUp! Program incentive of \$6,000 for a dual-port Level 2 charger and \$5,000 for a single-port Level 2 charger. Using the example proposals above, only \$9,500 would be available to the Low-Income Housing Multi-Unit Dwelling location, or 50.8% of the low-end bid on one of the sites in the project above. Kern COG suggests raising the incentive amount in the 2019 CALeVIP Program to \$8,000.
  - a) **The L2 incentive should not be reduced because of the VAD ChargeUp! Program in the Central Valley.** The VAD ChargeUp! Program exists because of the region's poor air quality. Approximately 80% of the air pollution in the air basin comes from mobile sources.

Approximately 76% of the most Disadvantaged Communities in the state of California exist in the San Joaquin Valley air basin. The VAD imposes additional air quality fees on vehicle registrations in the Valley. The individuals and businesses operating in the air basin pay for this program to meet Federal and State air quality goals. DMV Air Quality Fees range from \$2 to \$19 and are set by the local air districts. The Valley communities, which include more than three quarters of the states disadvantaged, should not be penalized and short-changed on the CALeVIP program because they are proactive and self-taxing to fund air quality programs, especially when approximately ¼ of trips in the Valley connect with more affluent regions of the state. For instance, in 2017, three national parks attracted over 6 million visitors who drive through the region: Yosemite National Park (4,336,890), Sequoia National Park (1,291,256 visitors) and Kings Canyon (692,932 visitors). Poor air quality affects the health of trees, contributing to the increasing vulnerability to wildfires, leading to more air quality issues. Millions of vehicles travel through the San Joaquin Valley each year, impacting local air quality. Several of these same travelers will benefit when they may easily charge their electric vehicles throughout the region, without competing for charging spaces.

- b) **The L2 incentive should not be reduced for the Valley because of the VAD ChargeUp! Program does not cover Eastern Kern County.** Two air districts operate in Kern County, the Eastern Kern Air Pollution Control District (EKAPCD) and VAD. Both districts fund EV Charging installation programs using Department of Motor Vehicle air quality fees. The EKAPCD program is not year-round. Entities in eastern Kern County applying for 2019 CALeVIP funding should not be penalized because of the VAD ChargeUp! Program.
  - c) **Lower L2 incentive burdens small cities and businesses with administrative costs.** And, **the CALeVIP program funding should be primary to allow it to serve as a match to the VAD ChargeUp! Program.** At these incentive levels, installing charging stations may require a business or agency to apply for more than two funding sources, because they cannot afford the match requirements or the total cost of the project. The applicants to the 2019 CALeVIP program should be able to use these funds as matching funds on other grant programs. To truly drive market development the 2019 CALeVIP incentive should be raised to \$8,000 with no VAD ChargeUp! Program penalty, which will make this a true incentive program and not simply off-set an expense, as well as reducing the administrative burden of applying, managing and reporting on several grants to simply install a handful of charging stations.
- 2) **A process for requesting an extension due to utility company delays should be added to the program.**
    - a) **The 2019 CALeVIP Program allows for a nine-month timeframe to install the L2 chargers and it requires that the chargers be networked.** The networking requirement adds expense to the ongoing operation of the station. Therefore, station hosts consider adding a separate utility meter or hiring a third-party contractor so that the station host does not have to bear the cost of the electricity. In our region, the utility goes through a design process. The process to install separate metering is currently taking up to seven months. An increase in requests may add to this delay. The time-limit may lead to abandoned projects, or discouraging inexperienced site hosts from installing EV charging station. Additionally, Kern COG suggests that the CEC work with the utilities (and the CPUC if necessary) to encourage other utilities to adopt the Sacramento Municipal Utility District's Smart Meter Program component of installing smart meters for free on EV charging station projects.
    - b) **Aging electrical infrastructure, especially in Disadvantaged Communities may limit participation in the CALeVIP program if no time extensions are allowed.**
  - 3) **Add medical clinics to the eligible location list for DC Fast Chargers to include smaller facilities operating in rural communities.** Agencies such as Clinica Sierra Vista operate medical clinics in numerous unincorporated communities located within a county. These locations may be ideally situated for DC Fast charging use by clinic staff, local residents and others working nearby or travelling through these communities.

- 4) Add a station locator registration requirement. The VAD ChargeUp! Program requires that recipients register their new, operational station on the Alternative Fuel Data Center Station Locator, operated by the U.S. Department of Energy. This website also has a mobile app helping EV drivers to find the stations as they travel. <https://www.afdc.energy.gov/stations/#/find/nearest>

If the CEC staff has any questions regarding these comments, please contact me, Linda Urata, at 661-635-2904 or via email at [lurata@kerncog.org](mailto:lurata@kerncog.org).

Thank you for your consideration.

Sincerely,

*Linda A. Urata*

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